



833 EAST MICHIGAN STREET • SUITE 1800
MILWAUKEE, WISCONSIN 53202-5615

TEL • 414.273.3500 FAX • 414.273.5198

WWW • GKLaw.COM

Direct: 414-287-9314
Bspahn@gklaw.com

April 3, 2018

VIA ECF AND FACSIMILE (212) 805-6737

The Honorable George B. Daniels
United States District Judge
United States Courthouse
500 Pearl Street, Room 1310
New York, NY 10007

RE: *K7 Design Group, Inc. et al. v. Fashion Angels Enterprises, Inc., et al.*
Case No. 1:17-cv-06943-GBD

Dear Judge Daniels:

On behalf of the parties in the above-referenced matter, we are submitting the attached proposed joint case management order in advance of the case management conference in this matter scheduled for April 11, 2018. The parties have consulted and agreed upon the dates included in the proposed case management order subject to Your Honor's approval.

Respectfully submitted,

/s/Brian C. Spahn

Brian C. Spahn

Attachment

cc: All counsel of record (via ECF)

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

K7 DESIGN GROUP, INC.,

Plaintiff-Counterclaim Defendant,

v.

FASHION ANGELS ENTERPRISES, INC.
and MARK MILLER,

Defendants,

M & G PARTNERS, LLP d/b/a FASHION
ANGELS ENTERPRISES,

Defendant-Counterclaim Plaintiff

Civil Action No.: 17-cv-6943 (GBD)

PROPOSED CIVIL CASE MANAGEMENT PLAN

After consultation with counsel for the parties, the following Case Management Plan is adopted. This plan is also a scheduling order pursuant to Rule 16 and Rule 26(f) of the Federal Rules of Civil Procedure.

1. An initial pretrial conference will be held on **Wednesday, April 11, 2018 at 9:45 a.m.** at the United States District Courthouse, 500 Pearl Street, New York, New York, Courtroom 11A.
2. The parties will exchange **initial disclosures** on or before **April 25, 2018**.
3. No **additional parties** may be joined after **April 27, 2018**.
4. No **amendment to the pleadings** will be permitted after **April 27, 2018**.
5. All **discovery** shall be commenced in time to be completed by **July 27, 2018**. The court expects discovery to be completed within 90 days of the first scheduling conference unless, after the expiration of that 90 days period, all counsel stipulate that additional time (not to exceed 60 more days) is needed to complete discovery. In such event, discovery may be extended by the parties on consent, without application to the Court, provided the parties are certain they can still meet the discovery completion date ordered by the Court. The discovery completion date shall not be adjourned except upon a showing of extraordinary circumstances.

6. **Dispositive motions** are to be served by **August 24, 2018**. Answering papers are to be served within 14 days. Reply papers are to be served within seven (7) days. In the event a dispositive motion is made, the date for submitting the Joint Pretrial Order shall be changed from that shown herein to three (3) weeks from the decision on the motion. The final pretrial conference shall be adjourned to a date four (4) weeks from the decision on the motion.
7. A **final pretrial conference** will be held on **September 24, 2018**.
8. The **Joint Pretrial Order** shall be filed no later than **September 17, 2018**. The requirements for the pretrial order and other pretrial submissions shall be governed by the Court's Individual Rules of Practice.
9. **All motions and applications** shall be governed by the Court's Individual Rules of Practice.
10. The parties shall be **ready for trial** within 48 hours' notice on or after **October 22, 2018**. The estimated trial time is 3 days, and this is a (jury)(non-jury) trial.

Dated: April ____, 2018
New York, New York

SO ORDERED:

The Honorable George B. Daniels
United States District Court Judge

Attorney for Plaintiff(s)

Attorney for Defendant(s)